

## **REMARKS**

Claims 24-32, 36 and 37 are pending in this application. Claims 1-23 and 33-35 have previously been cancelled without prejudice. Claims 24, 26 and 30 have been amended herein. Claims 24 and 26 have been amended to clarify that the term "simultaneously" in the originally filed claims refers to the position of the first and second introducers within the main lumen and a branch lumen at the same time and not to the timing of the positioning or the deployment which may be either sequential or simultaneous. Claim 37 has been added. No new matter has been added with these amendments. Support for these amendments may be found throughout the specification and in the FIGS., for example, paragraphs 0002 and 0050 and FIGS. 4 and 13. Favorable consideration and allowance are respectfully requested.

### **Claim Rejections Under 35 U.S.C. §103**

#### **A. Claims 24-32**

Claims 24-32 were rejected under 35 U.S.C. §103 (a) as being unpatentable over Vardi et al. (U.S. 2001/0003161).

Applicants respectfully traverse the rejection based on Vardi et al. Applicants respectfully request reconsideration of the rejected claims in light of the traversals and the claim amendments discussed below.

Applicants' claim 24 requires placing the first wire guide into the main lumen and the first branch lumen of the bifurcation and placing the second wire guide into the main lumen and the second branch lumen of the bifurcation wherein the first wire guide is placed into the main lumen and the first branch lumen and the second wire guide is placed into the main lumen and the second branch lumen of the bifurcation prior to advancement of the first introducer and the second introducer. Applicants' claim 26 requires placing a first wire guide into the main lumen and the first branch lumen of the bifurcation, advancing a second wire guide external to the first stent and placing a second wire guide into the main lumen and the second branch lumen of the bifurcation. Applicants' claim 30 requires deploying the first and second stents within the bifurcation such that at least a portion of the proximal portion of the first stent is in a

side-by-side configuration with at least a portion of the proximal portion of the second stent within the main lumen. Vardi et al. fails to teach or suggest these elements.

Vardi et al. is directed to a system for deploying a stent at a bifurcation wherein the second stent is positioned through the lumen and an opening in the first stent. See FIGS. 4, 5, 6, 7, 8 and 9 all showing the second stent within at least a portion of the first stent. In addition, Vardi et al. teaches away from positioning two separate guide wires through the primary vessel as described in the background at paragraph 0006, where "Unfortunately, when attempting to guide two such separate guide wires through the primary vessel such that one enters the branch vessel, the two guide wires typically tend to wrap around one another and become entangled. Additionally, time and effort is required to individually position each of the two guidewires one after the other." Vardi et al. also describes "An advantage of the present dual lumen catheter system is that it avoids having to separately position first and second guidewires within the respective primary and branch vessels prior to deployment of primary and branch stents thereover." (Paragraph 0008.) The second wireguide, catheter and stent of Vardi et al. all must be delivered through the first expanded stent to access the branch lumen. (See paragraph 0035.)

Clearly, Vardi et al. teaches away from placing the first wire guide into the main lumen and the first branch lumen of the bifurcation and placing the second wire guide into the main lumen and the second branch lumen of the bifurcation as claimed in claims 24 and 26. Vardi et al. further fails to teach or suggest that the second wire guide placed into the main lumen and the second branch lumen prior to the advancement of the first introducer and the second introducer. In fact, the system of Vardi et al. cannot place the second catheter without first expanding the first stent on the first catheter so the second catheter can be positioned therethrough. Similarly, Vardi et al. fails to teach or suggest advancing a second wire guide external to the first stent. Based on the description and figures discussed above, Vardi et al. also fails to teach or suggest deploying the first and second stents within the bifurcation such that at least a portion of the proximal portion of the first stent is in a side-by-side configuration with at least a portion of the proximal portion of the second stent within the main lumen as claimed in claim 30.

Thus, Applicants respectfully assert that the claimed invention in claims 24 -32 is not obvious over Vardi et al. Applicants respectfully request the rejection of claims 24 -32 under 35 U.S.C. §103(a) be withdrawn.

**B. Claim 36**

Claim 36 was rejected under 35 U.S.C. §103(a) as being unpatentable over Vardi et al. in view of Colgan et al. (U.S. 2003/0040789).

Applicants respectfully traverse the rejection based on Vardi et al. in view of Colgan et al. Applicants respectfully request reconsideration of the rejected claims in light of the traversals and the claim amendments discussed above.

Vardi et al. has been discussed above. Colgan et al. has been cited for providing an endoscope having a working channel. Colgan et al. is directed to a system for delivering a medical prosthesis. Colgan et al. fails to teach or suggest a method for placing first and second stents into a bifurcation having a main lumen and first and second branch lumens. Colgan et al. further fails to make up the deficiencies of Vardi et al. Together or individually, Vardi et al. and Colgan et al. fail to teach or suggest a reduced overall diameter in the staggered, adjacent configuration. Claim 36 depends from claim 24, discussed in detail above, and therefore is also not taught or suggested by Vardi et al. in view of Colgan et al.

Applicants respectfully assert that all of the recited elements in Applicants' rejected claim 36 are not found in the Vardi et al. and Colgan et al. references alone or in combination. Applicants respectfully request the rejection of claim 36 under 35 U.S.C. §103(a) be withdrawn.

## **SUMMARY**

Having carefully addressed the Examiner's objections and rejections, Applicants respectfully assert that the application is in condition for allowance. Allowance of the present claims is earnestly solicited.

Should the Examiner wish to discuss any of the above submissions in more detail, the Examiner is asked to please call the undersigned at the telephone number listed below.

Respectfully submitted,

Dated: February 19, 2008



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Heidi A. Dare  
Registration No. 50,775  
Attorney for Applicants

BRINKS HOFER GILSON & LIONE  
P.O. BOX 10395  
CHICAGO, IL 60610  
(312)321-4200